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*Attorneys for Defendant Udemy, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MOHAMED SALEH, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

UDEMY, INC.,

Defendant.

CIVIL ACTION NO. 2:23-cv-02207

Civil Action

**David Swetnam-Burland Reply Declaration**

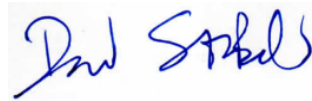
Pursuant to 28 U.S.C. § 1746, I, David Swetnam-Burland, declare and state as follows:

1. I am over the age of 18 and submit this reply declaration in support of Udemy, Inc.'s (Udemy's) motion to compel arbitration.
2. I am co-counsel for Udemy in this action, and have knowledge of the facts set forth in this declaration.
3. Attached as Exhibit A is a true and correct copy of ECF 12–1, Declaration of Jay Goettelmann in Support of J. Crew Group, LLC's Motion to Dismiss (Goettelmann Declaration), filed in *Babaeva v. J. Crew Group, LLC*, Case No. 4:23-cv-01695-JSW (N.D. Cal.), on May 17, 2023, which I downloaded from the public docket using the court's CM/ECF electronic filing system on November 9, 2023.

4. Attached as Exhibit B is a true and correct copy of that court's Order Granting Motion to Dismiss, Compelling Arbitration, and Staying Case, *Babaeva v. J. Crew Group, LLC*, 2023 WL 7346079 (N.D. Cal. Nov. 6, 2023) as published by Westlaw. In that order, the court cites the Goettelmann Declaration at pages \*1 and \*2.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 16, 2023



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David Swetnam-Burland